

# EXHIBIT B

to HarVest Bank of Maryland's  
Motion for Leave to Take Corporate Depositions

Plaintiff's Second Notice of 30(b)(6) Depositions

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Southern Division

HARVEST BANK OF MARYLAND	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.8:09-cv-00176-RWT
	)	
COUNTRYWIDE HOME LOANS,	)	
INC.	)	
	)	
Defendant	)	
	)	

SECOND NOTICE OF DEPOSITION

TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6) Plaintiff HarVest Bank of Maryland ("HarVest"), by counsel, will take the depositions upon oral exam of the designated representatives of Defendant Countrywide Home Loans, Inc. ("Countrywide"), on April 27, 2010, at 10 a.m. at the law offices of Luse Gorman Pomerenk & Schick, 5335 Wisconsin Ave NW Ste. 780, Washington D.C., 20015.

The depositions will be taken before a notary public or other person authorized to administer the oath. The depositions will be used for purposes of discovery and/or as evidence at trial.

The deposition will continue from day to day until completed.

The designated representatives of Countrywide shall be knowledgeable about the following subject matters, and shall bring with them any documents necessary to enable them to provide testimony on behalf of Countrywide regarding these matters:

1. Please designate a corporate representative to provide sworn and binding testimony on the subject matter of any and all oral and written communications before March 23, 2006 to any representative of HarVest Bank of Maryland and internal oral and

written communications within the Countrywide corporate entity, including any and all communications from and to Stuart McGehee and/or any member of the sales and production force prior to March 23, 2006, and the preservation of such recordings.

2. Please designate a corporate representative to provide sworn and binding testimony on the subject matter of the corporate policy for recording telephone conversations between representatives of Countrywide and representatives of investors, including HarVest Bank of Maryland, from the time of March 23, 2006 to the present.

3. Please designate a corporate representative to provide sworn and binding testimony on the subject matter of critiques, comments and communications to Countrywide management by Countrywide's Quality Assurance Group and/or Quality Control Group concerning underwriting practices for residential mortgage loans at the time when the loans purchased pursuant to the Agreement dated March 23, 2006 were originated, which includes the dates of December 22, 2005 through December 14, 2006, and for a period of two years prior.

4. Please designate a corporate representative to provide sworn and binding testimony on the subject matter of any and all audits and/or post purchase review of any loans purchased by HarVest Bank of Maryland pursuant to the Agreement dated March 23, 2006, by Countrywide's Quality Assurance Group and/or Quality Control Group and/or any other Countrywide corporate entity.

5. Please designate a corporate representative to provide sworn and binding testimony on the use of a "reasonableness" standard in evaluating statements of income and assets of borrowers in Countrywide's underwriting guidelines, including the "Platinum" guidelines, for residential mortgage loans originated from December 22, 2005 through December 14, 2006, and continuing to the present.

6. Please designate a corporate representative to provide sworn and binding testimony on the subject matter of the meetings and meeting minutes of Countrywide's

credit risk management department and credit risk committee(s) on the subject of underwriting standards and guidelines for residential mortgage loans originated from December 22, 2005 through December 14, 2006, and continuing to the present.

Respectfully submitted,

/s/

---

Michael R. Carithers, Jr.  
**LILES PARKER PLLC**  
4400 MacArthur Blvd. NW  
Suite 203  
Washington, D.C. 20007  
Tel.: (202) 298-8750  
*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, pursuant to Fed. R. Civ. P. 5(a) a true and correct copy of the foregoing was electronically filed and sent via first class mail to all counsel on the attached service list on this, the 30<sup>th</sup> day of March, 2010.

/s/

---

Michael R. Carithers, Jr.  
*Of Counsel*  
**LILES PARKER PLLC**  
4400 MacArthur Blvd. NW  
Suite 203  
Washington, D.C. 20007  
Email: mcarithers@lilesparker.com  
Bar No. 27272  
Tel.: (202) 298-8750  
Fax: (202) 337-5804  
*Counsel for Plaintiff*

**SERVICE LIST**

Robert A. Scott  
Glenn A. Cline  
Ballard Spahr Andrews & Ingersoll, LLP  
300 E. Lombard Street, 18th Floor  
Baltimore, MD 21202  
(410) 528-5600  
*Attorneys for Defendant*